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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE OPTICAL DISK DRIVE PRODUCTS  
ANTITRUST LITIGATION

CASE NO. 3:10-md-2143 RS

**STIPULATION AND [PROPOSED]  
ORDER REGARDING PLAINTIFFS'  
ADMINISTRATIVE MOTIONS TO SEAL  
(DOCKET NOS. 877, 880, 881 AND 895)**

This document relates to:

DATE ACTION FILED: Oct. 27, 2009

ALL ACTIONS

1 WHEREAS, on May 29, 2013, plaintiffs' counsel filed three administrative motions to file  
2 materials under seal, as Docket Nos. 877, 880, and 881;

3 WHEREAS, on June 3, 2013, the indirect purchaser plaintiffs filed an additional  
4 administrative motion to file materials under seal, as Docket No. 895;

5 WHEREAS, under Civil Local Rule 79-5(d), the deadline for filing declarations and  
6 materials in response to these administrative motions to seal is currently June 5, 2013 (as to  
7 Docket Nos. 877, 880 and 881) and June 10, 2013 (as to Docket No. 895);

8 WHEREAS, the administrative motion to seal filed by the direct purchaser plaintiffs  
9 (Docket No. 877) covers more than 200 exhibits submitted with the class certification motion,  
10 plus portions of the other filings made in connection with their motion for class certification;

11 WHEREAS, the administrative motion to seal filed by the indirect purchaser plaintiffs in  
12 connection with their motion for class certification (Docket No. 881) covers 87 exhibits, some of  
13 which include multiple documents produced by the defendants, plus portions of the other filings  
14 made in connection with their motion for class certification;

15 WHEREAS, plaintiffs filed under seal the expert report and expert declaration in support  
16 of their respective class certification motions, with accompanying exhibits;

17 WHEREAS, defendants' counsel require additional time to fully evaluate and respond to  
18 plaintiffs' administrative motions to seal, and to coordinate among defendants with respect to  
19 materials compiling or containing information produced by different defendants; and

20 WHEREAS, plaintiffs' counsel have no objection to providing additional time to respond  
21 to those administrative motions;

22 IT IS HEREBY STIPULATED:

23 The deadline for filing declarations and any other materials in response to the  
24 administrative motions to seal filed as Docket Nos. 877, 880, 881 and 895 shall be extended to  
25 June 19, 2013.

26 ///

27 ///

28 ///

1 IT IS SO STIPULATED.

2 DATED: June 5, 2013

LATHAM & WATKINS LLP

3  
4 By /s/ Belinda S Lee  
BELINDA S LEE

5 505 Montgomery Street, Suite 2000  
6 San Francisco, CA 94111  
7 Telephone: (415) 395-8240  
Facsimile: (415) 395-8095  
belinda.lee@lw.com

8 *Acting as Liaison Counsel for Defendants*

9  
10 DATED: June 5, 2013

HAGENS BERMAN SOBOL SHAPIRO LLP

11 By /s/ Shana E. Scarlett  
12 SHANA E. SCARLETT

13 Jeff D. Friedman (173886)  
14 715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
15 Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
jefff@hbsslw.com  
shanas@hbsslw.com

16  
17 *Interim Lead Counsel for Indirect Purchaser  
Plaintiffs*

18 DATED: June 5, 2013

SAVERI & SAVERI. INC.

19  
20 By /s/ Guido Saveri  
GUIDO SAVERI

21 R. Alexander Saveri (173102)  
22 Cadio Zirpoli (179108)  
23 706 Sansome Street  
San Francisco, CA 94111  
24 Telephone: (415) 217-6810  
Facsimile: (415) 217-6813  
25 guido@saveri.com  
rick@saveri.com  
26 cadio@saveri.com

27 *Interim Lead Counsel for Direct Purchaser Class*

ATTESTATION OF FILING

I hereby attest that concurrence has been obtained from each of the above signatories to file this document with the Court.

By: /s/ Belinda S Lee

\* \* \*

**IT IS SO ORDERED.\***

DATED: 6/5/13



HONORABLE RICHARD LEEBORG  
UNITED STATES DISTRICT COURT JUDGE

NY\5819762.1

\* The parties are reminded that sealing orders are to be narrowly tailored and that the only minimum redactions necessary to protect sealable information are permissible. See Civil Local Rule 79-5 and Commentary. The parties should strive towards providing a single, stipulated, proposed order that disposes of all sealing requests that have been or will be filed in connection with the class certification motion. If additional time will be necessary in light of the fact that further sealing requests may be filed, the parties may stipulate to additional extensions without seeking court approval, provided a global proposed sealing order is submitted at least one week prior to the hearing on the certification motion.